

REMARKS

This is a full and timely response to the non-final Office Action mailed June 2, 2005. Upon entry of the foregoing amendments, claims 1-41 are pending in the application. Claims 1, 13, 14, 19, 22, 26, 29, 33, 34, and 36 have been amended. The subject matter of claims 1, 13, 14, 19, 22, 26, 29, 33, 34, and 36 can be found in the originally filed specification in at least FIGs. 1-7 and the related detailed description. Consequently, no new matter is added to the present application. In light of the foregoing amendments and following remarks, Applicant requests reconsideration of the application and pending claims.

I. Claim Objections – Claims 13 and 22

In the Office Action mailed June 2, 2005 the Office objects to claims 13 and 22 because of the following alleged informalities: “an alphanumeric” in claim 13 should probably read “an alphanumeric character”; and “associate a particular label adds a link” in claim 22 should probably read “associate a particular label with a link.”

Regarding claim 13, Applicant agrees and has herein amended claim 13 in accordance with the suggestion of the Office. Consequently, the objection to claim 13 should be withdrawn.

Concerning claim 22, Applicant disagrees with the objection. In this regard, Applicant has herein amended claim 22 such that the claim includes “The program of claim 21, wherein the logic configured to associate adds a link.” Applicant respectfully submits that claim 22, as amended, defines the subject matter that Applicant regards as the invention. Accordingly, Applicant requests that the objection to claim 22 be withdrawn.

II. Claim Rejections Under 35 USC § 101 – Claims 1-13**A. Statement of the Rejection**

Claims 1-13 presently stand rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. More specifically, the statement of the rejection alleges that the claim limitations are not directed towards steps implemented on a computer. As such, the claimed steps could be carried out mentally.

B. Discussion of the Rejection

Applicants have amended claim 1 such that the preamble includes a "computer-implemented method." Accordingly, claim 1, as amended, is directed to statutory subject matter. Consequently, Applicant requests that the rejection of independent claim 1 under 35 U.S.C. § 101 be withdrawn.

Because independent claim 1 is allowable, dependent claims 2-13 are also allowable for at least the reason that these claims contain all the features of independent claim 1. *See In re Fine*, 837, F.2d 1071, 5 U.S.P.Q.2d 1596, 1598. (Fed. Cir. 1988). Accordingly, Applicant respectfully requests that the rejection of claims 2-13 under 35 U.S.C. § 101 also be withdrawn.

III. Claim Rejections Under 35 USC § 103 – Claims 1–41**A. Statement of the Rejection**

Claims 1-41 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent 6,185,560 to Young *et al.*, hereinafter *Young*, in view of U.S. Patent 5,708,825 to Sotomayor, hereinafter *Sotomayor*.

B. Discussion of the Rejection

In order for a claim to be properly rejected under 35 U.S.C. § 103, the combined teachings of the prior art references must suggest all features of the claimed invention to one of ordinary skill in the art. *See, e.g., In Re Dow Chemical*, 5 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1988), and *In re Keller*, 208 U.S.P.Q.2d 871, 881 (C.C.P.A. 1981). To establish a *prima facie* case of obviousness, the prior art reference (or references when combined) must teach or suggest all the claim limitations. For at least the reason that Applicant's independent claim 33 recites steps that are not disclosed, taught, or suggested by the proposed combination of *Young* and *Sotomayor*, Applicant respectfully traverses the rejection of claims 33-41.

Regarding Applicant's claims 1-32, Applicant's independent claim 1, as amended, recites steps that are not disclosed, taught, or suggested by the proposed combination of *Young* and *Sotomayor*. Furthermore, Applicant's independent claim 14, as amended, recites elements that are not disclosed, taught, or suggested by the proposed combination of *Young* and *Sotomayor*. Moreover, Applicant's independent

claim 19, as amended, recites logic that is not disclosed, taught, or suggested by the proposed combination of *Young* and *Sotomayor*. In addition, Applicant's independent claim 26, as amended, recites at least one element that is not disclosed, taught, or suggested by the proposed combination of *Young* and *Sotomayor*. Accordingly, Applicant respectfully requests that the rejection of claims 1-41 under 35 U.S.C. § 103 be withdrawn.

1. Claims 1-13

For convenience of analysis, independent claim 1, as amended, is repeated below in its entirety.

1. A computer-implemented method for navigating summarized textual data, comprising:
 - transforming data from a text format to a hypertext markup language format;
 - receiving a portion of text;
 - comparing the data with the portion of text to identify a match;
 - generating an entry responsive to the match;
 - inserting the entry in a data summary;
 - adding the data summary to the hypertext markup language format representation of the data;*** and
 - associating the entry with the contents of the transformed data responsible for the match.

(Applicant's independent claim 1 - *emphasis added*.)

The proposed combination fails to disclose, teach, or suggest at least the emphasized step of amended claim 1 as shown above. Consequently, claim 1 is allowable.

More specifically, the combination of *Young* and *Sotomayor* fails to disclose, teach, or suggest adding a data summary to the hypertext markup language format representation of the data.

In contrast with Applicant's claimed invention, *Young* apparently describes systems and methods for extracting data existing as complete lines in a report. Furthermore, *Young* apparently describes the automatic generation of virtual tables defining line patterns by type based on location and frequency of occurrence in the original report and establishing links to those definitions to facilitate data extraction.

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(See column 3, lines 1-5.) *Young* is entirely silent regarding the creation of a summary that is added to a hypertext markup language format representation of the data.

In further contrast with Applicant's claimed invention, *Sotomayor* apparently describes a system that scans one or more documents and automatically identifies significant key topics, concepts, and phrases in the documents, and creates summary pages for, and hyperlinks in between, these key topics. According to *Sotomayor*, the summary pages contain various abstractions of information contained in select documents and hyperlinks into the select documents. In contrast with *Sotomayor*, Applicant's claimed method includes "adding the data summary to the hypertext markup language format representation of the data." Inserting a hyperlink into a summary page that links an abstraction of information to a separate select document does not disclose, teach, or suggest adding a data summary to a hypertext markup language format representation of the data. Thus, the cited combination fails to disclose, teach, or suggest all features of the claimed invention. For at least this reason, the proposed combination fails to render Applicant's claimed method obvious. Consequently, claim 1 is allowable and the rejection of claim 1 under 35 U.S.C. § 103 should be withdrawn.

Because independent claim 1 is allowable, dependent claims 2-13 are also allowable for at least the reason that these claims contain all the features of independent claim 1. *See In re Fine, supra*. Accordingly, Applicant respectfully requests that the rejection of claims 2-13 under 35 U.S.C. § 103 also be withdrawn.

There are separate and additional reasons for the patentability of several of Applicant's dependent claims. For example Applicant's dependent claim 5 recites that the label is reflective of a level of importance. In this regard, the statement of the rejection alleges that *Young*, column 6, lines 56-64, disclose this element. Applicant respectfully disagrees for at least the reason that the cited portion of *Young* describes a degree of membership threshold, which is a numeric value representing the degree of similarity between a text line and a species template required for the text line to be included in the species. A numeric value indicative of the degree of similarity between a text line and a species template does not disclose, teach, or suggest a label

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reflective of a level of importance. Accordingly, Applicant's claim 5 is allowable for at least this separate and additional reason.

Applicant's dependent claim 6 recites that the level of importance is indicated via a color. The proposed combination fails to disclose, teach, or suggest that a level of importance is indicated via a color. In this regard, the statement of the rejection alleges that *Young*, column 10, lines 20-33, discloses this limitation. Applicant respectfully disagrees. The cited portion of *Young* appears to describe a specificity gradient assigned to data type characteristics. Example data type characteristics include the number of characters allowed, "constant characters", *i.e.*, those characters which must appear as is in the field value. *Young* does not disclose, teach, or suggest indicating a level of importance via a color. Accordingly, Applicant's claim 6 is allowable for at least this separate and additional reason.

Applicant's dependent claim 7 recites that the level of importance is indicated via a label. The proposed combination fails to disclose, teach, or suggest that a level of importance is indicated via a label. In this regard, the statement of the rejection alleges that *Young*, column 1, lines 23-27, discloses this limitation. Applicant respectfully disagrees. The cited portion of *Young* appears to describe a title line that is associated with subsequent text. A title line as apparently disclosed in *Young* does not disclose, teach, or suggest indicating a level of importance via a label. Accordingly, Applicant's claim 7 is allowable for at least this separate and additional reason.

2. Claims 14-18

For convenience of analysis, independent claim 14, as amended, is repeated below in its entirety.

14. A text enhancer, comprising:
 - means for receiving a text file having a plurality of lines of information;
 - means for comparing the plurality of lines of information with a string to generate a match;
 - means for compiling a statistic on the match;
 - means for converting the text file to a hypertext markup language translation of the text file; and

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means for adding a summary to the hypertext markup language translation.

(Applicant's independent claim 14 - *emphasis added*.)

The proposed combination fails to disclose, teach, or suggest at least the emphasized element of amended claim 14 as shown above. Consequently, claim 14 is allowable.

More specifically, the combination of *Young* and *Sotomayor* fails to disclose, teach, or suggest a text enhancer comprising means for adding a summary to the hypertext markup language translation.

In contrast with Applicant's claimed invention, *Young* apparently describes systems and methods for extracting data existing as complete lines in a report. Furthermore, *Young* apparently describes the automatic generation of virtual tables defining line patterns by type based on location and frequency of occurrence in the original report and establishing links to those definitions to facilitate data extraction. (See column 3, lines 1-5.) *Young* is entirely silent regarding the creation of a summary that is added to a hypertext markup language translation.

In further contrast with Applicant's claimed invention, *Sotomayor* apparently describes a system that scans one or more documents and automatically identifies significant key topics, concepts, and phrases in the documents, and creates summary pages for, and hyperlinks in between, these key topics. According to *Sotomayor*, the summary pages contain various abstractions of information contained in select documents and hyperlinks into the select documents. In contrast with *Sotomayor*, Applicant's claimed text enhancer comprises "means for adding a summary to the hypertext markup language translation." Inserting a hyperlink into a summary page that links an abstraction of information to a separate select document does not disclose, teach, or suggest means for adding a summary to a hypertext markup language translation. Thus, the cited combination fails to disclose, teach, or suggest all features of the claimed invention. For at least this reason, the proposed combination fails to render Applicant's claimed text enhancer obvious. Consequently, claim 14 is allowable and the rejection of claim 14 under 35 U.S.C. § 103 should be withdrawn.

Because independent claim 14 is allowable, dependent claims 15-18 are also allowable for at least the reason that these claims contain all the features of independent claim 14. *See In re Fine, supra*. Accordingly, Applicant respectfully requests that the rejection of claims 14-18 under 35 U.S.C. § 103 also be withdrawn.

3. Claims 19-25

For convenience of analysis, independent claim 19, as amended, is repeated below in its entirety.

19. A program stored on a computer-readable medium, comprising:
 logic configured to receive text data;
 logic configured to locate a text string within the text data;
 logic configured to log located text strings, wherein each occurrence of a particular text string is associated with an indicator;
 logic configured to translate the text data to a hypertext markup language format;
 logic configured to register a respective label in a text data summary;
 logic configured to add the text data summary to the hypertext markup language format; and
 logic configured to associate a particular label with occurrences of the particular text string located within the text data.

(Applicant's independent claim 19 - *emphasis added*.)

The proposed combination fails to disclose, teach, or suggest at least the emphasized element of amended claim 19 as shown above. Consequently, claim 19 is allowable.

More specifically, the combination of *Young* and *Sotomayor* fails to disclose, teach, or suggest logic configured to add the text data summary to the hypertext markup language format.

In contrast with Applicant's claimed invention, *Young* apparently describes systems and methods for extracting data existing as complete lines in a report. Furthermore, *Young* apparently describes the automatic generation of virtual tables defining line patterns by type based on location and frequency of occurrence in the

original report and establishing links to those definitions to facilitate data extraction. (See column 3, lines 1-5.) *Young* is entirely silent regarding logic configured to add the text data summary to the hypertext markup language format.

In further contrast with Applicant's claimed invention, *Sotomayor* apparently describes a system that scans one or more documents and automatically identifies significant key topics, concepts, and phrases in the documents, and creates summary pages for, and hyperlinks in between, these key topics. According to *Sotomayor*, the summary pages contain various abstractions of information contained in select documents and hyperlinks into the select documents. In contrast with *Sotomayor*, Applicant's claimed program comprises "logic configured to add the text data summary to the hypertext markup language format." Inserting a hyperlink into a summary page that links an abstraction of information to a separate select document does not disclose, teach, or suggest logic configured to add the text data summary to the hypertext markup language format. Thus, the cited combination fails to disclose, teach, or suggest all features of the claimed invention. For at least this reason, the proposed combination fails to render Applicant's claimed program obvious. Consequently, claim 19 is allowable and the rejection of claim 19 under 35 U.S.C. § 103 should be withdrawn.

Because independent claim 19 is allowable, dependent claims 20-25 are also allowable for at least the reason that these claims contain all the features of independent claim 19. *See In re Fine, supra*. Accordingly, Applicant respectfully requests that the rejection of claims 20-25 under 35 U.S.C. § 103 also be withdrawn.

4. Claims 26-32

For convenience of analysis, independent claim 26, as amended, is repeated below in its entirety.

26. A computer system, comprising:
a processor;
an execution memory communicatively coupled to the processor; and
a text enhancer application stored within the execution memory, wherein the text enhancer application comprises:
a conversion engine configured to transform text data into hypertext markup language;

a query engine configured to locate a match between a text string and the text data;
a content reporting engine configured to generate an entry responsive to a number of located matches;
a data indexing engine configured to associate the text string and the text data such that a user of the system can navigate between the entry and the text data; and
a formatting engine configured to insert a data summary before transformed text data in the hypertext markup language.

(Applicant's independent claim 26 - *emphasis added*.)

The proposed combination fails to disclose, teach, or suggest at least the emphasized element of amended claim 26 as shown above. Consequently, claim 26 is allowable.

More specifically, the combination of *Young* and *Sotomayor* fails to disclose, teach, or suggest a text enhancer application comprising a formatting engine configured to insert a data summary before transformed text data in the hypertext markup language.

In contrast with Applicant's claimed invention, *Young* apparently describes systems and methods for extracting data existing as complete lines in a report. Furthermore, *Young* apparently describes the automatic generation of virtual tables defining line patterns by type based on location and frequency of occurrence in the original report and establishing links to those definitions to facilitate data extraction. (See column 3, lines 1-5.) *Young* is entirely silent regarding a formatting engine configured to insert a data summary before transformed text data in the hypertext markup language.

In further contrast with Applicant's claimed invention, *Sotomayor* apparently describes a system that scans one or more documents and automatically identifies significant key topics, concepts, and phrases in the documents, and creates summary pages for, and hyperlinks in between, these key topics. According to *Sotomayor*, the summary pages contain various abstractions of information contained in select documents and hyperlinks into the select documents. In contrast with *Sotomayor*, Applicant's claimed formatting engine is configured to insert a data summary before transformed text data in the hypertext markup language. Inserting a hyperlink into a summary page that links an abstraction of information to a separate select document

does not disclose, teach, or suggest a formatting engine configured to insert a data summary before transformed text data in the hypertext markup language. Thus, the cited combination fails to disclose, teach, or suggest all features of the claimed invention. For at least this reason, the proposed combination fails to render Applicant's claimed computer system obvious. Consequently, claim 26 is allowable and the rejection of claim 26 under 35 U.S.C. § 103 should be withdrawn.

Because independent claim 26 is allowable, dependent claims 27-32 are also allowable for at least the reason that these claims contain all the features of independent claim 26. *See In re Fine, supra*. Accordingly, Applicant respectfully requests that the rejection of claims 27-32 under 35 U.S.C. § 103 also be withdrawn.

5. Claims 33-41

For convenience of analysis, independent claim 33, as amended, is repeated below in its entirety.

33. A method for navigating between summary information and textual data *in a report*, comprising:
identifying a text string;
associating a summary label with the text string;
accessing a text file containing a plurality of lines of textual information;

determining if each of the plurality of lines contains the text string, wherein when a line of textual information contains the text string, the line of textual information is added to the summary label to generate a summary line in the report;

translating the summary line to a hypertext markup language (HTML) format;

accessing the text file containing a plurality of lines of textual information;

determining if each of the plurality of lines contains the text string, wherein when a line of textual information does not contain the text string, the line of textual information is translated to a HTML format and concatenated to the summary line in the report and when a line of textual information does contain the text string, the line is translated to a HTML format with HTML code that associates the line of textual information to the summary line, the line of textual information containing the text string appended to the report.

(Applicant's independent claim 33 - *emphasis added*.)

The proposed combination fails to disclose, teach, or suggest at least the emphasized limitations of claim 33 as shown above. Consequently, claim 33 is allowable.

More specifically, the combination of *Young* and *Sotomayor* fails to disclose, teach, or suggest a method for navigating between summary information and textual data in a report. In addition, the combination of *Young* and *Sotomayor* fails to disclose, teach, or suggest determining if each of the plurality of lines contains the text string, wherein when a line of textual information contains the text string, the line of textual information is added to the summary label to generate a summary line in the report.

In contrast with Applicant's claimed invention, *Young* apparently describes systems and methods for extracting data existing as complete lines in a report. Furthermore, *Young* apparently describes the automatic generation of virtual tables defining line patterns by type based on location and frequency of occurrence in the original report and establishing links to those definitions to facilitate data extraction. (See column 3, lines 1-5.) *Young* is entirely silent regarding mechanisms and/or steps for navigating between summary information and textual data in a report. Furthermore, *Young* is silent regarding adding a line of textual information to a summary label to generate a line in the report.

In this regard, the statement of the rejection alleges that *Young*, column 7, line 64 to column 8, line 34, teaches Applicant's claimed step of determining if each of the plurality of lines contains the text string, wherein when a line of textual information contains the text string, the line of textual information is added to the summary label to generate a summary line in the report. Applicant respectfully disagrees for at least the reason that the cited portion of *Young* is entirely silent regarding when a line of textual information contains the text string, the line of textual information is added to the summary label to generate a summary line in the report. *Young* is extracting data not generating a summary. Because *Young* is not generating a summary, *Young* cannot be said to disclose, teach, or suggest adding a line of text information to a summary label to generate a summary line in the report.

Moreover, the statement of the rejection alleges that *Young*, column 12, line 64 to column 13, line 30, teaches Applicant's claimed step of determining if each of the plurality of lines contains the text string, wherein when a line of textual information contains the text string, wherein when a line of textual information does not contain the text string, the line of textual information is translated to a HTML format and concatenated to the summary line in the report and when a line of textual information does contain the text string, the line is translated to a HTML format with HTML code that associates the line of textual information to the summary line, the line of textual information containing the text string appended to the report. Applicant respectfully disagrees for at least the reason that the cited portion of *Young* is entirely silent regarding when a line of textual information contains the text string, the line is translated to a HTML format with HTML code that associates the line of textual information to the summary line, the line of textual information containing the text string appended to the report. The cited portion of *Young* is apparently concatenating adjacent fields that are separated by space in the report. A procedure for concatenating adjacent fields separated by space in a report does not disclose, teach, or suggest when a line of textual information does not contain the text string, the line of textual information is translated to a HTML format and concatenated to the summary line in the report. Moreover, procedure for concatenating adjacent fields separated by space in a report does not disclose, teach, or suggest when a line of textual information contains the text string, the line is translated to a HTML format with HTML code that associates the line of textual information to the summary line, the line of textual information containing the text string appended to the report.

In further contrast with Applicant's claimed invention, *Sotomayor* apparently describes a system that scans one or more documents and automatically identifies significant key topics, concepts, and phrases in the documents, and creates summary pages for, and hyperlinks in between, these key topics. According to *Sotomayor*, the summary pages contain various abstractions of information contained in select documents and hyperlinks into the select documents. In contrast with *Sotomayor*, Applicant's claimed method is directed to navigating between summary information and textual data in a single report. Inserting a hyperlink into a summary page that links an abstraction of information to a separate select document does not disclose,

teach, or suggest navigating within a report. Furthermore, inserting a hyperlink into a summary page that links an abstraction of information to a separate select document does not disclose, teach, or suggest determining if each of the plurality of lines contains the text string, wherein when a line of textual information contains the text string, the line of textual information is added to the summary label to generate a summary line in the report. Thus, the cited combination fails to disclose, teach, or suggest all features of the claimed invention. For at least these reasons, the proposed combination fails to render Applicant's claimed method obvious. Consequently, claim 33 is allowable and the rejection of claim 33 under 35 U.S.C. § 103 should be withdrawn.

Because independent claim 33 is allowable, dependent claims 34-41 are also allowable for at least the reason that these claims contain all the features of independent claim 33. *See In re Fine, supra*. Accordingly, Applicant respectfully requests that the rejection of claims 33-41 under 35 U.S.C. § 103 also be withdrawn.

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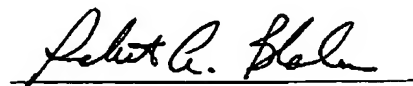
CONCLUSION

For at least the reasons set forth above, Applicants respectfully submit that pending claims 1-41 are allowable over the cited art of record and the present application is in condition for allowance. Accordingly, a Notice of Allowance is respectfully solicited. Should the Examiner have any comments regarding the Applicant's response, Applicant requests that the Examiner telephone Applicant's undersigned attorney.

Respectfully submitted,

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